U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

PLAINTIFF'S THIRD RESPONSE TO ORDER ECF No. 218

Plaintiff now responds to the commandment "Plaintiff shall respond under oath to the following interrogatories: a. Identify every statement made by Defendant that Plaintiff claims was defamatory toward Plaintiff and, for each such statement, provide a citation to a specific source." (See ECF No. 208 for language). This is the THIRD response to ECF no. 218.

Plaintiff reserves the right to submit follow-up pleadings on this matter until the deadline of April 30, 2021.

That response is contained herein and are certified under the penalties of perjury as truthful. All representations included herein are fair and accurate reproductions of the original sources.

A Certificate of Service appears on the LAST page of this pleading.

Signed this twenty second (3/22) day of March, 2021.

Respectfully,

D. Geo. Sweigert

D. GEORGE SWEIGERT GENERAL DELIVERY NEVADA CITY, CA 95959 SPOLIATION-NOTICE@MAILBOX.ORG

Statement no.22 (Posts of the Defendant)



CrowdsourcetheTruth @csthetruth · May 21, 2020

David Sweigert is a deadbeat dad, a maladjusted misanthropic obsessed loser & part of a social engineering crew protecting the most despicable people around. Help counteract his feckless efforts by sponsoring Crowdsource the Truth

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CrowdsourcetheTruth @csthetruth - May 21, 2020

David Sweigert is a deadbeat dad, a maladjusted misanthropic obsessed loser & part of a social engineering crew protecting the most despicable people around. Help counteract his feckless efforts by sponsoring Crowdsource the Truth

https://twitter.com/csthetruth/status/1263627026487017473

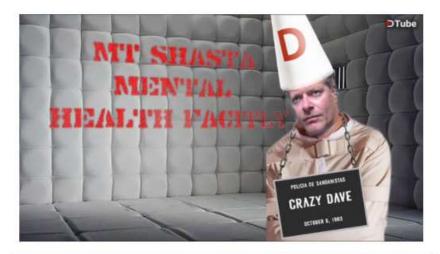


twitter.com > csthetruth > status :

CrowdsourcetheTruth on Twitter: "David Sweigert is a ...

May 21, 2020 — CrowdsourcetheTruth - @csthetruth. Sponsor exclusive content on Patreon & SubscribeStar http://patreon.com/crowdsourcethetruth ...

Statement no.23 (Posts of the Defendant)



David Sweigert has been colluding with his brother and numerous other nefarious individuals for the past nine months in an impotent attempt to frame me for crimes, defund my business and destroy my reputation. It isn't working however, because he's a dope and that is obvious.

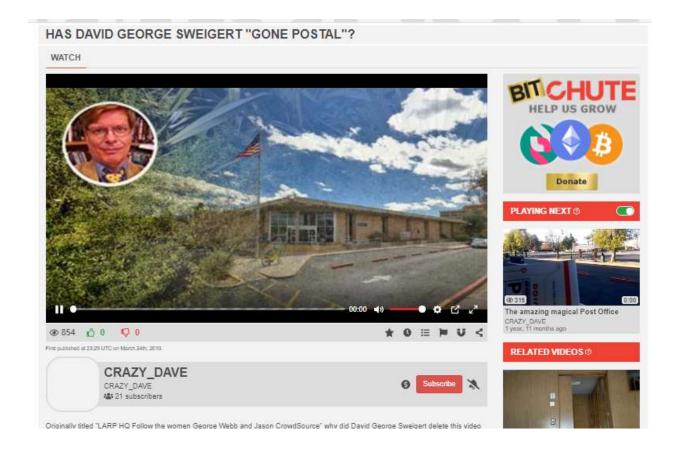
https://steemkr.com/acton/@csthetruth/y9qoxz7t





David Sweigert has been colluding with his brother and numerous other nefarious individuals for the past nine months in an impotent attempt to frame me for crimes, defund my business and destroy my reputation. It isn't working however, because he's a dope and that is obvious.

Statement no.24 (Posts of the Defendant)



https://www.bitchute.com/video/SJnBzYc18a8P/

Originally titled "LARP HQ Follow the women George Webb and Jason CrowdSource" why did David George Sweigert delete this video only minutes after uploading it? Did he realize he'd revealed too much? Is he trying to figure out if Jason Goodman of Crowdsource the Truth really has engaged the U.S. Postal Inspector in the alleged case of mail fraud?

Statement no.25 (Defendant to audience)

Comments made by Defendant:

- 00:45 I have taken a great interest in lawfare. A lot of people have heard me talk about that. The use of the law as a weapon.
- 01:00 I have been embroiled in a lawfare battle of my own. I have been the target of lawfare.
- 01:19 Because it is the same tactic I think that is being used against President Trump uh.. it was used against Dr. (Jerome) Corsi.
- 01:50 I was just down here at the Pro Se unit in the Southern District of New York filing an answer to yet another, not an answer but a response. To a frivolous letter motion submitted by David George Sweigert, brother of George Webb Sweigert. These are two individuals I am convinced are working together.
- 03:55 We don't have that so much with Steven Biss or David Sweigert. Two very unscrupulous individuals that use the law as a weapon.
- 04:30 David Sweigert and Robert David Steele are working towards a common purpose.
- 04:40 They intend to use lawfare as one of their primary weapons.
- 05:36 You might recall that Manuel Chavez provided e-mails to me between him and Robert David Steele.
- 05:59 Robert David Steele, and Robert David Steele's lawyer, and Robert David Steele's wife, and Manuel Chavez and other people were involved in a conspiracy that was intended to bring multiple lawsuits against me in multiple jurisdictions.
- 09:09 Its time for Dave Sweigert to be shutdown from his legal bullying. He's a bully and bullies are cowards. So he's a coward and he's a disgrace.
- 14:07 Mr. Sweigert is fearful that his case is about to get kicked out.
- 17:28 We've got social engineers engaging in and assisting others in lawfare.

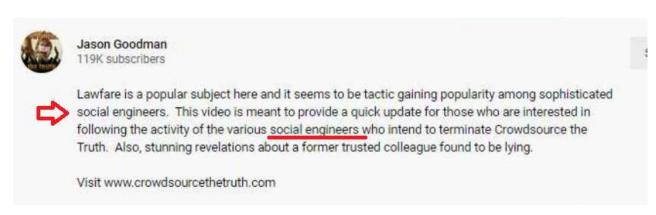


https://www.bitchute.com/video/aDRUFyb54PY/



https://www.youtube.com/watch?v=aDRUFyb54PY







Statement no.26 (Defendant's posts)



Above: Redacted tweet of Jason Goodman, "Cyberstalker / deadbeat dad David Sweigert abandons his own son XXXXXX to troll me with fake news ..."



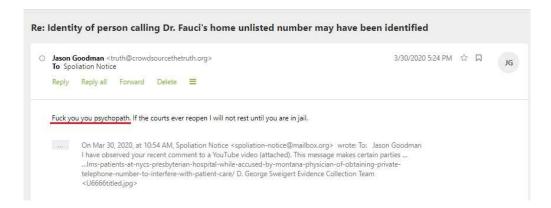
Above: The above tweet was sent to these addresses

See page 19 of the First Supplemental Complaint (ECF no. 150)

Statement no.27 (Defendant's posts)



Above: Def. Goodman's 03/30/2020 e-mail message to 22 people, declaring that the Plaintiff is "mentally unstable and is a serial stalker ... he is attempting to disrupt public health services and sow panic amid this crisis.."



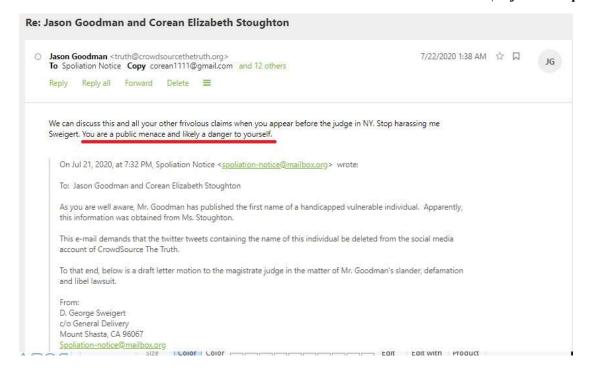
Above: Jason Goodman's 3/30/2020 e-mail message to the Plaintiff, "F_k you you psychopath. If the courts ever reopen I will not rest until you are in jail."



Above: Jason Goodman's 5/31/2020 e-mail message to 11 people that Plaintiff is a "cyber stalker ... as well as wife swapping with his own brother ...".

See page 21 of the First Supplemental Complaint (ECF no. 150)

Statement no.28 (Defendant's posts)



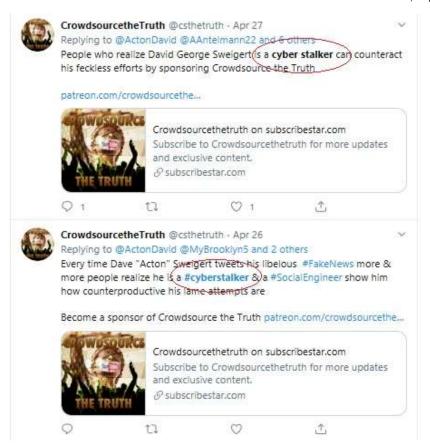
Above: Def. Goodman's 7/22/2020 e-mail message responding to a request to remove tweet's with the name of the Plaintiff's son states, "[y]ou are a public menace and likely a danger to yourself."



Above: Def. Goodman's 6/19/2020 e-mail message to 13 people stating the Plaintiff is "a serial cyberstalker ... he is believed to be mentally ill...".

See page 22 of the First Supplemental Complaint (ECF no. 150)

Statement no.29 (Defendant's posts)



Above: Def. Goodman's tweets of 04/26 and 04/27/2020 labeling the Plaintiff as a "cyberstalker" (this is a mere sampling) and "show him how counterproductive his lame attempts are.."



Above: Def. Goodman's tweet of 05/12/2020 labeling the Plaintiff as a "deadbeat dad brother Dave who really should call his abandoned special needs son XXXXX..." (redacted)

See page 23 of the First Supplemental Complaint (ECF no. 150)

Statement no.30 (Defendant's posts)



Above: Def. Goodman's tweet of 05/06/2020 stating, that Plaintiff is a "dead beat dad and serial cyberstalker" (this is a mere sampling) and "show him how futile his efforts are..".



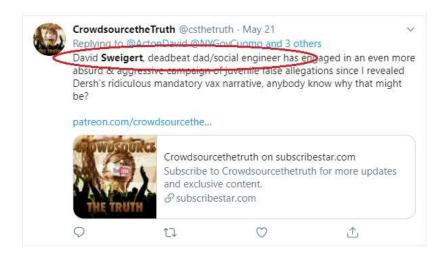
Above: Def. Goodman tweet of 05/02/2020 stating, that the Plaintiff "is a serial cyber stalker &self admitted wife swapper..."



Above: Def. Goodman tweet of 04/27/2020 stating "David George Sweigert is a cyber stalker" and "counteract his feckless efforts by supporting Crowdsource The Truth..."

See page 24 of the First Supplemental Complaint (ECF no. 150)

Statement no.31 (Defendant's posts)



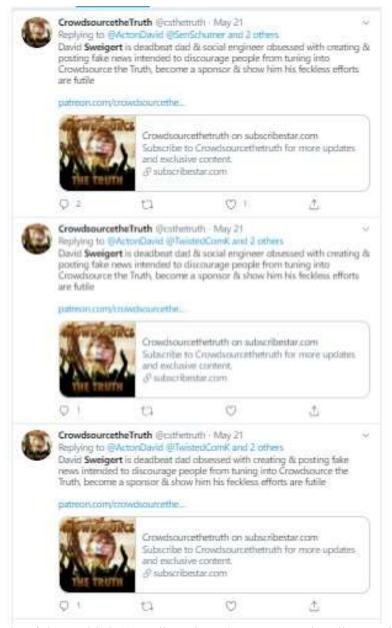
Above: Def. Goodman tweet of 05/21/2020 stating, "David Sweigert, deadbeat dad/social engineer.."



Above: Def. Goodman's tweet of 04/27/2020 stating Plaintiff is "a malicious cyber stalker" and "& wife swapping"

See page 25 of the First Supplemental Complaint (ECF no. 150)

Statement no.32 (Defendant's posts)



Above: Example of the multiple (usually a dozen) tweets per day disparaging the Plaintiff

See page 26 of the First Supplemental Complaint (ECF no. 150)

Statement no.33 (Defendant's posts)



Above: Def. Goodman uses the image of the Plaintiff to support his theory of "social engineers"



Above: Photo attached to Defendant's tweet of 04/12/2020

See page 31 of the First Supplemental Complaint (ECF no. 150)

The undersigned hereby attests that the foregoing exhibits are true reproductions of the original source documents.

Signed this twenty second (3/22) day of March 2021.

Respectfully,

D. Geo. Sweigert

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the twenty second (3/22) day of March, two thousand and twenty-one (2021).

Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 temporary_pro_se_filing@nysd.uscourts.gov Jason Goodman, CEO Multimedia System Design, Inc. 252 7th Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org

> D. GEORGE SWEIGERT Pro Se Non-Attorney GENERAL DELIVERY NEVADA CITY, CA 95959